

IV.6 Individual DEIR Mailed Comments P-76 to P-150

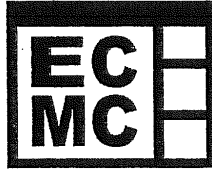
This section presents responses to individual public comments (i.e., not form letter or form letter based) received the U.S. mail or other non-electronic delivery services. The responses immediately follow each letter and are organized in the same order as the comments in each letter. Several of the letters included attachments. Attachments were not included herein if our response did not directly reference the attachment.

Mailed comment submissions with multiple copies of a single letter format will be addressed in one sample from each type of form letter. Those with additional comments added will be addressed individually if the comment is substantive and thus warrants a separate response.

There will not be comment letters for every number within the series because some letters dropped if they were duplicates or if they were found to be form letters. Form letters are responded to in their own section of the FEIR

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-79



EMPLOYERS COUNCIL
of Mendocino County

February 12, 2006

Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, Calif. 94244-2460

Dear Board Members:

1 We encourage you to adopt alternative C-1 for the future management of Jackson Demonstration State Forest (JDSF).

2 The Employers Council of Mendocino County represents 200 local business members who provide around 4000 jobs in our County, which is about 10% of our County's 40,000 jobs. We are deeply concerned with the condition of our community's economy.

Our County has lost its historic economic base. In 1970 over 1/3 of the jobs in our County were created by the wood products industry. Today it's not even 5%. Just between 2000 and the end of 2004 we lost over 1600 goods producing jobs, many if not most timber-related, and replaced about 1450 of them with much lower-paying service jobs. During that same time local governments increased their staffs by over 1200. The trend of losing private sector jobs and shifting private sector workers income down while increasing local government jobs and payroll can not continue.

3 Your decision regarding the future of the JDSF will determine the economic viability of hundreds of timber-worker families and dozens of businesses in what remains of our timber industry. It will also determine whether or not our County, one of California's most indebted per resident, will be able to use a restored timber harvest tax to help retire that terrible debt burden. Our timber workers have been devastated by the collapse of timber jobs. We believe it is unconscionable to continue to deny them the opportunity to earn a living in their chosen and honorable career when responsible timber harvest operations can occur under Alternative C-1.

Alternative C-1 is a fair compromise. On the one hand it will allow a significant economic contribution from timber harvests and the continuance of JDSF's research and education mission. At the same time it establishes significant protections for the environment and provides for public enjoyment of the woods.

Some of the positives we see in Alternative C-1 and the rest of the EIR and Management Plan are:

- 4
1. The E.I.R. and the proposed management plan listed and answered the concerns and recommendations of the previous citizen's advisory committee.
- 5
2. Clear cutting, though allowed on a limited acreage basis under current California Forest Practice Rules, would only be carried out when needed for scientific research purposes. A major part of JDSF's mission is to test different forest management systems in different situations to determine

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FINAL EIR FOR JDSF MANAGEMENT PLAN

best practices, both environmental and economic, for the long run. Whereas everyone accepts that some of the practices of the past can no longer continue, we need to refine our knowledge of what works and what doesn't.

- 6 3. Each harvest is to be planned around a specific harvest regime to further the demonstration goals of the forest.
- 7 4. Legislation regarding the Forest Practice Rules relative to the Forest is quoted and followed in the EIR and accompanying plan.
- 8 5. JDSF personnel have recognized for decades environmental concerns and have been at the forefront in improving forest harvesting practices and the protection of stream and wildlife resources. Their one shortcoming has been their inability to distribute to forestland owners and the general public the results of the myriad harvesting and other studies that have taken place on the forest. Resumption of full management will provide the funding and incentive to get information out where it can be used.
- 9 6. Approval of the EIR and the accompanying management plan would allow the return of management to the Forest and the funding, incentive and direction to re-staff JDSF so that the roads and other resources can again be maintained. This 50,000 acre forest was hard hit by the heavy rains of this winter and had considerable road and erosion damage.
- 10 7. Somewhere around half of the land here on the north coast is forest. A major challenge to the timber industry, both industrial and non-industrial, is the constantly changing approaches of various agencies, including State Forest Practice Rules, Fish and Game Dept. concerns, Water Quality Board rules, and other State and Federal agencies. Demonstration harvest operations at JDSF are needed which can show private landowners how to cope with regulations and at the same time leave the forest in a productive and healthy state.
- 11 8. The remaining mill capacity and harvesting operators on the north coast need the regular timber sales program that the JDSF provided in the past. Without JDSF's volume, the continuance of the necessary infrastructure for this industry is at risk. A regular sales program helps maintain operational stability as well as a stable, capable, work force.
- 12 9. We all recognize the acute housing needs in California. The proposed harvest program provides the fiber needed to build upwards of 3000 single family houses annually. It is irresponsible to live in one of the most productive timber-growing regions on earth and make more and more forestland unavailable for timber production while our state continues to use huge amounts of timber products.
- 13 10. California and Mendocino County are struggling to meet budget needs. JDSF will provide the State and County with significant resources to fund other vital services. The last yield tax return from a full season of harvesting was in the neighborhood of \$350,000. The income from the proposed harvest level at current market prices would be about \$15,000,000 to be used to support the management of the Forest and for the State's Forest improvement Program without dipping into the state's budget. Our state hasn't been able to balance its budget; why not bring JDSF back on line to help?

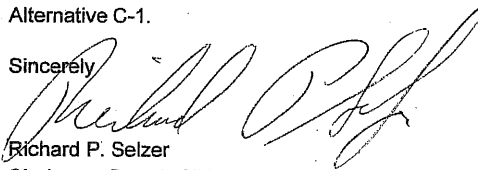
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14 The EIR projects that if JDSF comes back on line it will sustain 240 timber jobs paying \$7,600,000 in wages and 240 support jobs producing \$4,700,000 in wages. The EIR also projects sales taxes from these wages at \$162,000. We believe these estimates, though impressive for this county, are too low. Forest jobs produce three or more support jobs for each job in the forest or mill. We think the economic benefit of a productive JDSF will spread throughout the North Coast community.

15 The shutdown of JDSF has imposed a huge cost to Mendocino County and our citizens – families have lost jobs, small businesses are hurt, taxes and income are way down. California's North Coast has one of the oldest average aged populations in the United States. We used to export wood products, now we export our kids because they can't earn a living. Our beautiful region has only a few economic advantages in the emerging global economy; growing redwoods clearly is one of our main strengths. Your decision literally will determine if hundreds of young people will be able to stay in their home towns or be forced to leave. In order to prevent further deterioration of our communities, we truly hope you will adopt Alternative C-1.

Sincerely,



Richard P. Selzer

Chairman, Board of Directors

Employers Council of Mendocino County

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www.ecmconline.com ♦ ecmc@ecmconline.com

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-79

Response to Comment 1

Support for Alternative C1 noted. Alternative G was developed by blending the elements and management strategies of several Alternatives, including Alternative C1. The Board has emphasized JDSF research and demonstration role.

Response to Comment 2

The economic analysis provided in the DEIR supports these comments.

Response to Comment 3

The Board agrees that JDSF can help support the local economy, in terms of direct jobs, indirect jobs, payroll, timber products, tax revenue generation, and demonstration that contributes to sustainable forest management by the private sector. The management plan will make a significant contribution to the local economy, in part by providing for a significant level of sustained timber production.

Response to Comment 4

The Board agrees that the management plan addresses most of the recommendations made by the Citizen's Advisory Committee.

Response to Comment 5

The Board agrees with this statement. It is the Board's intent that JDSF be utilized to test, understand, and demonstrate a wide variety of forest management practices.

Response to Comment 6

It is the intent of the management plan that each harvest be an integral component of a long-term stand management regime.

Response to Comment 7

The management plan reflects the enabling legislation and regulation.

Response to Comment 8

The management plan provides for a significant effort to distribute the results of research and demonstration.

Response to Comment 9

Comment noted. The revenue generated by the Forest will be utilized primarily in support of management activities within the state forest system.

Response to Comment 10

The Board agrees with these statements. Demonstration of environmentally and cost effective management in compliance of regulatory requirements is an important aspect of state forest management.

Response to Comment 11

The management plan will provide for a significant contribution to the local economy, including a sustainable level of timber production.

Response to Comment 12

The Board agrees that a stable and productive local timber economy can make a significant contribution to local needs for timber products.

Response to Comment 13

The management of the Forest is expected to make a significant contribution to the local economy, and will provide economic support for the management of the Forest.

FINAL EIR FOR JDSF MANAGEMENT PLAN

Response to Comment 14

Comment noted. The estimates of jobs produced for a given level of timber production are variable among economists.

Response to Comment 15

Comment noted. Please see DEIR Sections III.5 and III.6 for the assessment of potential economic effects. The Board fully supports full and continued management of the Forest and support of the local economy.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-84

James D. Hooper
203 East Pine Street
Fort Bragg, Ca 95437

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BOARD OF FORESTRY
AND FIRE PROTECTION

February 9, 2006

George D. Gentry, Executive Officer
Board of Forestry & Fire Protection
P. O. Box 944246
Sacramento, Ca 94244-2460

Dear Mr. Gentry,

I live along the Mendocino Coast and have seen the impact of lawsuits resulting in the shutdown of Jackson Demonstration State Forest has had on our area. This has gone on long enough. A few years ago Oakland was being threatened by lawsuits in tearing down the dilapidated Montgomery Ward warehouse that was being used by drug users, etc. The aim of the lawsuits was harassment and to tie things up. I remember the mayor and council members got on TV and made it abundantly clear that this was not going to be allowed. Enough is enough. When is the State of California Board of Forestry going to stand up? The lawsuits against Jackson Demonstration State Forest are to eliminate the purpose it was intended for. One of the key individuals in trying to put Jackson Demonstration State Forest out of business was caught clear cutting his own property without a logging permit no less! Jackson Demonstration State Forest was established in 1947, and has over the years become the largest forest in the state forest system for the purpose of research and demonstration of sustainable timber harvesting methods. Research done in this forest has been used in other forest management areas. For sometime now as a result of lawsuits and our state not standing up and saying enough is enough research has stopped, road maintenance is very neglected, there is no stream restoration, no timber stand improvement, many jobs including state ones have been lost, and the state is losing badly needed income from timber sales and taxes including from employment. It is time to accept the Alternative B Environmental Impact Report and end the impasse.

James D. Hooper

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-84

Response to Comment

Please see Response to Form Letter 3. Support for Alternative B noted. Alternative G was developed by blending the elements and management strategies of several Alternatives, including B. The Board has emphasized the research and demonstration mission of the state forest. The Board recognizes that some would like to “eliminate the purpose” that JDSF and the other demonstration state forests were intended. The ADFFMP strives to balance the concerns of all Californians while remaining consistent with the legislative mandate and Board policy for the state forest system.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-85

Dennis M. Crean, Jr.
16740 Tomki Road
Redwood Valley, CA 95470

February 9, 2006

Board of Forestry and Fire Protection
1416 9th Street, Room 1506-14
Sacramento, CA 95814

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BOARD OF FORESTRY
AND FIRE PROTECTION

Dear Board Members,

I am a resident of Mendocino County, and I care deeply about the future of Jackson State Forest. As you well know, the concern of citizens such as myself has helped to halt the "business as usual" approach to managing and logging the forest. It is time for us all to come together in support of a new direction for this public forest.

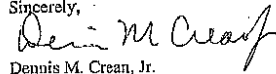
1
2
In this spirit, I urge you to reject the state's call for continued cutting of old growth, clearcutting, herbicide use, and only token input from members of the public into the future of the forest. I strongly oppose option C-1 as outlined in the new Draft Environmental Impact Report. This option is backward looking and will surely result in a continued struggle between citizens and the CDF.

Instead, I urge you to support the spirit of future as outlined in option E. I would like to see Jackson State Forest receive a greater focus on restoration, recreation, education, and scientific research into innovative new ways of understanding the forest ecology. This wonderful forest can serve to demonstrate more than logging techniques. We live in a new era in which the timber industry is no longer king in Mendocino County, and for which Jackson State Forest must not represent the few remaining crumbs for it to fight over. My forest demands a brighter future.

As for the DEIR, I am disappointed that it fails to fully consider the environmental effects of my preferred option, E. I have insufficient basis upon which to analyze and compare the various options. On top of that, the document is nearly impossible to understand and navigate due to its inordinate length. I hope you will reject this DEIR and demand an environmental analysis that truly considers all the management options.

Further, I hope you will join me in calling for a new management plan that looks forward, not backward, for the benefit of all Californians, and particularly for those generations who will follow us.

Sincerely,


Dennis M. Crean, Jr.

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-85

Please see response to Form Letter 2

Response to Comment 1

See General Response 8.

Response to Comment 2

The Department has formed an advisory committee for the state forest system as a whole, and intends to maintain a broad spectrum of membership, including abundant expertise and knowledge in environmental issues. The current committee includes local representation by government and environmental interests, as well as representation by the University of California. The ADFFMP also incorporates plans for the creation of a JDSF specific advisory committee. The Board encourages the Department to consider local citizen input, and also encourages field trips and other public interaction to make the management of the State Forest open to the public and to the receptive of public input. See General Response 18.



Acme Automotive Company

DIVISION OF AACO AUTOMOTIVE DISTRIBUTORS, INC.
WHOLESALE DISTRIBUTORS OF AUTO PARTS, SUPPLIES AND EQUIPMENT
350 S. MAIN STREET FORT BRAGG, CA 95437
(707) 964-4011

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BOARD OF FORESTRY
AND FIRE PROTECTION

February 10, 2006

George D. Gentry, Executive Officer
Board of Forestry & Fire Protection
P.O. Box 944246
Sacramento CA 94244-2460

Mr. Gentry:

The reason for this letter is to request that you return Jackson Demonstration State Forest to active status by accepting the Proposed Alternative "B" Environmental Impact Report. The shut-down of J.D.S.F. has had a very negative effect on the economy of our community and our county. As the owner of a small business in Fort Bragg I have had to cut my work force from 14 to 10 employees over the last 2 years and sales are down by about 15%.

We desperately need more jobs in our county and a working J.D.S.F. would provide nearly 500. Let's use the forest for what it was originally intended: timber production, scientific research, and recreation. The benefits are many: timber revenue for the State of California, timber taxes for our local schools, lower unemployment for our county, and the advancement of sustainable forestry and logging practices.

Please help our community, our county, and our state by restoring Jackson Demonstration State Forest to it's intended use.

Sincerely,

Joseph R. Pardini

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-90

Response to Comment

Please see response to Form Letter 4.

P-94

The Endangered Species Act is very important to many grassroots efforts, and the Forest Service and National Parks System is in transition. The National Parks Monopoly (misspelling correction: monopoly) is not a joke. I feel that privatization of our trees, plants, soil, dirt, other animals, water, and air is a big mistake.

The Endangered Species Act is very important and is very important in that it holds the idea that all species maintain a necessary right to exist and coexist.

FEB 14 2005
BOARD OF FORESTRY
AND FIRE PROTECTION

Nathan Daniel Stout
1260 Hopkins Street
Berkeley, CA 94702

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-94

Response to Comment

The comment letter is not clearly related to the management of JDSF. The management of JDSF will comply with the Endangered Species Act. Privatization of JDSF and its forest resources is not proposed.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-97

George D. Gentry, Executive Officer
Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA. 94244-2460

2/9/06

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BOARD OF FORESTRY
AND FIRE PROTECTION

Dear Mr. George D. Gentry,

1 I am writing in regards to the new Environmental Impact Report for Jackson State Forest. I understand that in the past the CDF was logging on outdated management plans in Jackson State Forest and they have finally, three years later, come up with a new EIR.

2 It was so wonderful to stroll through Jackson State Forest over the past year and see re-growth in these areas. I think it's a shame that the CDF will be logging there again for business-as-usual. This forest belongs to the people and I don't agree with what ~~is happening~~ will happen there soon. This forest is the only state forest that is home to a significant percentage of mature Redwoods, an increasingly rare and valuable forest ecosystem for both wildlife habitat and recreation!

3 I am asking for the logging to stop in Jackson State Forests. ~~and~~ IF you allow it anyway then I am asking you to allow another 60 day comment period. The complexity and sheer volume of the 1500-page E.I.R. makes it difficult for the public to respond during the too-brief period allowed for public comment. Thank you.

Sincerely,
Sophia Brenner → my address
901 Stanyan St. #18
San Francisco, CA. 94117

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-97

Response to Comment 1

Future management of the Forest will be conducted pursuant to an updated management plan.

Response to Comment 2

Comments noted. There are eight state forests within the state forest system. The state forest system is occupied primarily by second-growth forest stands with a significant component of trees between 60 and 100 years of age. The management plan proposes to maintain a significant area dominated by larger trees in this age range, and will recruit or develop a substantial area of older forest structure and late seral forest dominated by trees that are larger and older than currently exist in most areas of the forest. Please see also General Response 2 and 9.

Response to Comment 3

Comments noted. The primary legislated purpose of the State Forest is to serve as a demonstration of economical forest management. The Board has provided a public comment period that is sufficient to allow for thorough review and comment on the DEIR (see General Response 5).

FINAL EIR FOR JDSF MANAGEMENT PLAN

P- 100

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BOARD OF FORESTRY
AND FIRE PROTECTION
February 9, 2006

George D Gentry
Executive Officer
Board of Forestry and Fire protection
P.O. Box 944246
Sacramento, Ca 94244-2460

RE: Jackson Demonstration State Forest Draft EIR and Management Plan

Dear Mr. Gentry,

1 I would like to express my approval of the contents of the current Draft EIR for the Jackson Demonstration State Forest (JDSF). It appears to me that the documents are a good faith effort to identify, disclose and analyze a variety of management alternatives and their potential environmental impacts on a number of different levels of scale.

2 I would also like to express my approval of the preferred alternative of C1. I believe that the Draft Management Plan of May 2002 offers the flexibility to allow continued management of the forest under a variety of different silvicultural prescriptions which will provide a wide range of habitat types. It is a well thought out management plan updating environmental protections for wildlife, fisheries, beneficial uses of water, old growth groves and individual old growth trees. It is a flexible plan which allows for the forest to be managed as the current legislation mandates. The variety of harvest types are important to create the different types of habitat and forest conditions for different research. This is a demonstration forest and it should be allowed to demonstrate the wide range of current and future forest management practices. It should not be hindered by unnecessary restrictions on otherwise lawful and productive forest management practices. The research programs contribute to improved forest practices on JDSF and many private land holdings. In order for this type of research to continue the forest needs diversity in stand structure only obtained by continued harvesting. JDSF needs to remain a laboratory for research and demonstration of innovative techniques for private landowners. The preferred alternative C1 allows this to continue in the most beneficial way.

3

Congratulations on completion of the EIR. I would like to encourage the California Board of Forestry & Fire Protection to accept and certify the DEIR, and to choose the preferred alternative C1 and help keep JDSF working for all of California.

Sincerely,

Robert Horvat

Robert Horvat
320 S. McPherson Street
Fort Bragg, CA 95437

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-100

Response to Comment 1

Comment noted.

Response to Comment 2

Support for Alternative C1 noted. It is the Board's intent that JDSF remain a relevant and diverse research setting with a wide variety of forest stand conditions. Alternative G was developed by blending the elements and management strategies of several Alternatives, including Alternative C1. The Board has emphasized JDSF research and demonstration role. Please see also General Response 2.

Response to Comment 3

The management of JDSF will provide a valuable demonstration to timberland owners throughout the region and the state.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-103

RECEIVED BY *Foothill Resource Management*
P.O. Box 818, Pine Grove, CA 95665
(209) 296-1569

FEB 14 2006

State of California Board of Forestry
c/o Mr. George Gentry, Executive Officer
P.O. Box 944246
Sacramento, CA 94244-2460

BOARD OF FORESTRY
AND FIRE PROTECTION

8 February 2006

Dear Boardmembers,

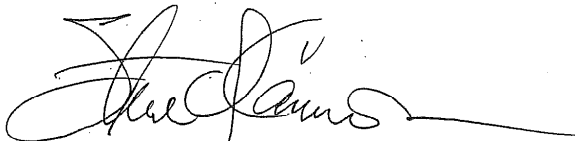
1 As a forest landowner and Registered Professional Forester, I am interested in the productive and sustainable management of all forests in California. I understand that the Board of Forestry is reviewing the EIR for the management plan of the Jackson Demonstration State Forest and your board will soon be required to vote on the approval of this EIR and management plan. I would like to express my support for the EIR and Alternative C1. I support the continued management of Jackson Demonstration State Forest as a sustainably managed forest.

2 The advantages of harvesting timber on a sustainable basis have been demonstrated to me on our family tree farm. We enhance the health of the forest through thinnings, we remove unproductive and flammable brush, we plant more trees than have existed on the forest in the last 150 years and we protect wildlife habitat and watershed values. At the same time we earn income and assist the local economy by providing jobs for people that work in the woods. The value of the timber that is harvested from our forest is enhanced by milling and tax revenues are received by the State of California at all stages of the manufacturing process. Our local schools benefit from the severance taxes and our county general fund benefits, as well.

3 All of these benefits can be realized by the people of Mendocino County and the State of California if Jackson Demonstration State Forest is managed the same way that our family tree farm is managed. The EIR that has been prepared for JDSF is comprehensive and illustrates the ability to harvest trees sustainably while protecting other resource values. The preferred alternative is an example of true multiple use management. The expressions of "gloom and doom" that are being put forth by the opponents of timber harvesting on JDSF are unscientific and facetious. I would like to see the Board of Forestry support this kind of management on all our Demonstration State Forests.

Please approve the EIR for the Jackson Demonstration State Forest management plan and return this valuable property to a productive status.

Sincerely,



Steve Q. Cannon, RPF #2316

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-103

Response to Comment 1

Support for Alternative C1 noted. Alternative G was developed by blending the elements and management strategies of several Alternatives, including Alternative C1. The Board has emphasized JDSF research and demonstration role. The management plan will provide for sustainable forest management.

Response to Comment 2

The Board recognizes and promotes these values and benefits associated with good forest management. The management plan will provide for continuation of these values and benefits.

Response to Comment 3

JDSF will continue to be managed for multiple uses, values, and benefits. Please see General Response 2.

FINAL EIR FOR JDSF MANAGEMENT PLAN

Memo from -

V. RUTH DUNN



Alan Dunn
24861 Ward Ave.
Fort Bragg, CA 95437-8458

P- 106 2- ~~RECEIVED BY~~

FEB 14 2005

Dear Sirs,

The impact of shutting down
Jackson State Forest are
unbelievable! Our town &
community are desperate for
jobs so that our children
may grow up in this
beautiful, safe place. There
are so few economic advantages
for our aging population.

Your decision is vital to
hundreds of lives! Thank you!

Alan & Ruth Dunn

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-106

Response to Comment

It is the Board's intention to certify the DEIR and approve the management plan in order to restore full management to JDSF. A significant level of sustainable timber production will continue at JDSF under the ADFMP. The economic setting and the economic impacts of various levels of harvest, in terms of estimated employment and local revenues, are discussed in section III.6.2 of the DEIR. The resumption of timber production is expected to have a positive economic impact in the region.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P- 112

Mendocino Woodlands Camp Association

A National Historic Landmark
A Nonprofit Corporation since 1949

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BOARD OF FORESTRY
AND FIRE PROTECTION

Post Office Box 267
Mendocino, Ca 95460

Call 707 937 5755
Fax 707 937 5415

www.mendocinowoodlands.org

February 10, 2006

Board of Forestry and Fire Protection
PO Box 944246
Sacramento, CA 94244

Re: Support draft EIR Alternative F

Dear Members of the Board:

1a On behalf of the Board of Directors of the Mendocino Woodlands Camp Association and the thousands of campers that attend the Mendocino Woodlands annually, we are strongly urging you to adopt **Alternative F** for the management of Jackson State Forest. This is the same basic plan that was approved by both the Assembly and Senate last year, only to be vetoed by the governor.

In addition, I am addressing a small corner of the Jackson State Forest that has an immense impact on the Mendocino Woodlands. That portion is now referred to as the Mendocino Woodlands Special Treatment Area (STA). Our goal at MWCA is the complete restoration of the original park, from all of the buildings and structures in the state park, to the reunification of the STA with the Woodlands. We intend, at this time, to address this issue of reunification of the land to its original boundaries. Following are background and reasons.

1b As you know, the Woodlands is a group campground. The facility is a wood-and-stone work of art built by the CCC in the 1930s. It was one of forty-six campgrounds created during that time, conceived to provide a setting for activities that would introduce the public to the wonders of nature. The Woodlands is the only one of these camps that has been continuously used for its original purpose and has survived intact. It was given to the people of California *in perpetuity* with a mandate that states "...said property shall be used exclusively for public park, recreation and conservation purposes." Now, it seems that the uses "public park" and "conservation" are at odds.

In 1997, the Woodlands became a National Historic Landmark because its buildings are of exceptional architectural value and significant importance to the history of the United States. According to the National Park Service, "This is one of the best remaining examples of Recreational Demonstration Area planning and design in the country. The RDAs were a new kind of state park planned by the National Park Service during the New Deal."

Fifty-six years ago, in 1948, our nonprofit corporation was founded to manage and care for the facility. The campground is divided into three very large, private, group rental facilities. Each of the three camps is a separate, self-contained area with its own cabins, kitchens with dining and recreation halls, shower facilities, and campfire circle. In addition, there are forest, meadows, marshes, rivers and wildlife throughout the campground, making it a perfect setting for recreation, relaxation, meditation, or study.

Many campers who use the Woodlands have been doing so literally for generations. They brought their children over 50 years ago, who are now bringing their children. And they've booked their camps for years to come.

Lots of different kinds of groups enjoy the campgrounds. Groups of 30 to over 200 can be accommodated, depending on the camp. In the past year, we generated 32,810 camper-days at the Woodlands. According to the Chamber of Commerce, the average visitor to the Mendocino



FINAL EIR FOR JDSF MANAGEMENT PLAN

Coast spends \$500 during their stay. Thus we are a big contributor to the total income from Mendocino County's main industry: tourism.

Even more important than excellent camping, the Woodlands offers, as required by legislation, environmental education programs. We have qualified professional staff members who guide campers and students in exploring and learning about natural communities, wildlife, and understanding and respecting ecosystems. Naturalist-led day and night hikes, pond or stream life or tide pool exploration and slide shows are just a few of the programs offered.

Our Residential Outdoor Science School (ROSS) is the largest environmental educational program at the Woodlands and one of the best of its kind in the country. Every spring the Woodlands plays host to nearly 800 students and teachers from all over Northern California as they attend ROSS. The curriculum is based on in-depth studies of North Coast redwood and stream ecosystems. Teachers bring their students to the Woodlands to practice hands-on science in a pristine environment. Alternative locations to study forest and stream ecology for urban and suburban schools are few and are often limited to small roadside parks and irrigation ditches. Teachers and students have commented numerous times on the "wilderness feel" of Mendocino Woodlands State Park. They live on-site and study in small field groups of 10 students each under the guidance of a qualified naturalist. Students also experience being part of a small community where each person is a valued member. All activities—learning groups, recreation time and meals—are structured to encourage cooperation. By week's end, positive communication and problem-solving skills have been strengthened and new friendships have been fostered, as well as appreciation and respect for nature.

A major drawing point for visitors to Mendocino Woodlands State Park has always been the extensive network of trails. In 2003, the MWCA education staff led 2,135 campers in on-site hikes. Nearly every hike included traversing a trail within the STA surrounding the park. As large as that number may seem to be, it does not accurately portray the total trail usage. Missing are the numerous unguided day-hikers, bike-riders, and occasional backpackers. The number of hikers continues to increase each year.

Without access to the unspoiled trails within the STA, the public's experience would be severely limited. There are only four complete trails within the confines of the narrow 720 acres of the park. Altogether they total about 3 miles; a mere 12% of the 25 miles presently available to the visitor.

The STA that surrounds the Woodlands has been the subject of much discussion and confusion over the years. Originally, it was part of a grand park created by the federal government, which was then called the Mendocino Woodlands Recreation Demonstration Area. In 1976 it took legislative action, in the form of Senate Bill 1063, to secure a small portion of the original park—only 720 acres out of the original 5,425—and create what was then called the Mendocino Woodlands Outdoor Center. This was done in order to save and preserve the Woodlands' structures and immediate surroundings. The original park was carved up into pieces including the state park we have today and a two-piece Special Treatment Area consisting of 2,550 acres. One-quarter of the STA is now a virtual in-holding of State Parks, since Big River State Park was created in 2002. This STA surrounds the Woodlands as a designated "buffer". Senate Bill 1063 originally required State Parks' approval before any timber harvest activity in the STA. Later that wording was stricken from the bill. The California Department of Forestry (CDF) manages the STA and has harvested timber there in recent years.

The impact of the STA on the Woodlands is seen the moment you turn off Little Lake Road at the Mendocino Woodlands sign. You are completely surrounded by towering forests. Most believe they have entered the protected State Park but everywhere you look is the STA. For the next 3-1/2 miles you wind down through this unprotected area. Once you enter the narrow corridor that is the Mendocino Woodlands State Park, all of the hillsides and ridge tops that you see are within the STA. The STA totally dominates the Woodlands' landscape and contains all of its watershed, springs and most of its hiking trails.

FINAL EIR FOR JDSF MANAGEMENT PLAN

5 Over the years, through communication with the California Resources Agency and its departments, we have been informed that the existing MOU provides adequate protection for the STA. We disagree with this conclusion. Among other things, MOUs, by their very nature, can be terminated with only 30 days' notice, thereby providing no lasting protection at all.

6 At the celebration for the purchase of the new Big River State Park held in Spring 2002, it was announced that the area originally known as the Mendocino Woodlands Recreation Demonstration Area would be managed for "old growth development" including the existing Railroad Gulch research area. There are frequent references in the draft management plan for the Jackson State Forest to managing the STA for "late seral habitat development", which is old growth. One problem is that it seems no one can provide us with any kind of description or guideline for exactly what that means.

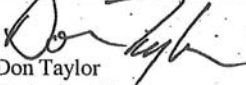
The following negative impacts are compelling reasons for the complete cessation of timber harvests in the Mendocino Woodlands Special Treatment Area.

- 7 1. Camping experiences for the public would be greatly spoiled by noise and dust, thereby causing diminished use of this historic park.
- 8 2. Hiking/Camping experiences for the public would be greatly spoiled by the view of cut-down trees, also causing diminished use of this historic park.
- 9 3. Available trails would be greatly reduced.
- 10 4. Degradation of watershed.
- 11 5. The Little North Fork of the Big River would have additional silt, impeding salmon's ability to spawn.

12 [Because of its very close proximity and the fact that the STA overlooks the entire park, we feel strongly that the STA should be reintegrated into the Mendocino Woodlands State Park, thereby permanently protecting the STA from future timber harvests and preserving the peace and beauty for which the public comes to the Woodlands, as originally mandated. At this time, the Mendocino Woodlands Camp Association respectfully requests that the Board of Forestry and Fire Protection consider these possible solutions to the challenges involving the STA:

- 1 1. The Special Treatment Area be transferred into the jurisdiction of the California Department of Parks and Recreation, thus ending many years of costly management conflicts and preserving, intact, the original RDA. CDF would not be giving up any investment on their part as the entire Mendocino Woodlands Recreation Area was given to the people of California as a gift.
- 13 2. Set the STA aside, with no harvesting activity, as a baseline example of how the redwoods can heal themselves and become old growth once again.
- 14 3. If the California Department of Forestry feels that they must manage the forest to bring about old growth characteristics, then use the south side of the STA, which is not contiguous with the rest of Jackson State Forest, as a baseline example of how the redwoods can heal themselves and become old growth once again, and manage the north side with an easy hand, with clearly stated limitations and practices, to insure the public that this land will be treated with the public's use and enjoyment in mind.

We understand that the board has a big challenge in dealing with the Jackson State Forest and thank you for your time and consideration on this matter.


Don Taylor
Executive Director
Mendocino Woodlands
Camp Association

FINAL EIR FOR JDSF MANAGEMENT PLAN

Letter P-112

Response to Comment 1a

Support for Alternative F is noted. The proposed Administrative Draft Final Forest Management Plan (ADFFMP) contains elements of Alternative F, for example, designation of expanded areas for development of late seral and older forest structure.

Response to Comment 1b

The statement above expresses an opinion that public park and conservation uses are it odds. If fact, the area deeded to the State of California by the U.S. Government has been utilized successfully for both purposes since the area was placed under the administration of the Division of Forestry in 1947.

The forested area that includes the current Mendocino Woodlands State Park was deeded to the State of California by the United States of America during September of 1947. The deed was conditional, stating that the State of California shall use the property exclusively for public park, recreational, and conservation purposes. The State of California inquired of the U.S. Government; "Is it the intent and will the Department of Interior recognize the harvesting of forest products, and the conducting of forest experiments and demonstrations on the area as complying with the term 'conservation purposes'?" The U.S. Government responded to the question as follows; "I also believe that the harvesting of forest products in accordance with the recognized conservation principles and practices and the conducting of forest experiments and demonstrations would be compatible with the term 'conservation purposes', since it is generally acknowledged that such economic and scientific utilization of timbered areas ultimately results in the conservation of our forest resources." (G. Davidson, Assistant Secretary of the Interior, 1946).

Response to Comment 2

The Mendocino Woodlands Camp area is located within the Mendocino Woodlands State Park. The entire area was clearcut between 1850 and 1930, but has regrown into beautiful stands of redwood and Douglas-fir forest. However, this is not a pristine environment. Rather, it is a recovering forest and watershed area, with stands that reflect a long history of forest management and utilization. Teachers and students are able to examine a substantial area of forest that has remained relatively undisturbed for decades, and other areas that have been managed on a selective basis, where students can be educated in forest ecology, forest management, forest conservation, and forest utilization.

The current Mendocino Woodlands State Park was created by the enactment of SB 1063 (Behr) in 1976. In Section 5821, the legislature made the following finding; "The Legislature finds that there is need for a program to enable the children of the state to better comprehend the outdoors, particularly the social and economic importance of the study, conservation, protection, and utilization of natural resources. The Legislature further finds that the location and facilities of the Mendocino Woodlands Outdoor Center are especially well suited to serve primarily as an outdoor education center under the control and management of the Department of Parks and Recreation, as a unit of the state park system." While this form of childhood education is an element of the programs provided by the current concessionaire, Mendocino Woodlands Camp Association, it does not represent the principle use of the area.

Two timber harvest proposals are included in the Short-Term Harvest Schedule (DFMP Table 5). One of these is planned as a selection harvest demonstration that was initiated in 1984. The second is a proposed harvest outside of the Special Treatment Area (STA) in upper Thompson Gulch, which is planned as a demonstration of selective harvesting intended to create late-seral forest habitat conditions. The vast majority of the STA and the remainder of the federally deeded area would continue to grow undisturbed in the near term, with the exception of regular recreational activity and road maintenance.

FINAL EIR FOR JDSF MANAGEMENT PLAN

Response to Comment 3

It is anticipated that public access to the trails within the STA will not be eliminated, but periodic interruption of use could occur where trail segments enter areas that are subject to forest management activities. This would represent a temporary closure for public safety. As stated above, two limited stand management activities are planned, and one of these is within the STA. The segments of trail that would be affected were constructed in the mid-1980s specifically to offer recreationalists, educators, and students an opportunity to observe the selection harvest demonstration area. The major trails through the STA would remain open to public use, with optional routes available when segments are temporarily closed (e.g., Railroad Gulch Silvicultural Demonstration Area). The trails within the STA have been provided with mitigation measures to preserve their aesthetic values, including a buffer on either side of the trails and a limit upon the form of management that may occur within the buffer. Please refer to Sections VII.7.2, VII.12, and VII.14 of the DEIR for an analysis of potential impacts to aesthetics and recreation. Potential impacts to recreational resources are also discussed in other sections of the DEIR that consider specific forms of impact.

Response to Comment 4

The commenter's description of the STA as "towering forest," etc., illustrates the effectiveness of management of the STA, and has not resulted in conditions that detract from the Woodlands Outdoor Center or the State Park.

The purpose for establishment of the Special Treatment Area surrounding the Mendocino Woodlands Outdoor Center is clearly established in the enabling legislation. Section 5824 of SB 1063 (Behr) provides for access through the park "for purposes of cutting timber under the authority of the State Forester". Other than this passage and the descriptive establishment of the STA, section 5829 provides conditions placed upon the State Forester as follows; "Prior to authorizing the sale and cutting of timber from the area described in subdivision (c) of Section 5823, the State Forester shall solicit and consider the recommendations of the Department of Parks and Recreation with respect to the prevention of unnecessary or unreasonable interruption or loss of facilities or resources essential to center operations."

Response to Comment 5

The concern, as stated, does not enumerate the type of impact anticipated, or what form of protection is deemed to be adequate. There is an existing MOU between the California Department of Forestry and Fire Protection and the California Department of Parks and Recreation that involves the relationship of the two agencies with regard to management of the general Mendocino Woodlands area (Memorandum of Understanding, October 2000, CDF and DPR). The MOU includes restrictions upon forest management in proximity to the state park, intended to provide protection for recreational uses and to prevent significant impacts upon aesthetics and camp operations. The MOU also deals with issues related to the management and maintenance of roads in the area. Mr. Taylor is correct in stating that the MOU may be cancelled by either agency with prior notice to the other. The MOU is not intended specifically to serve as a means of providing "adequate protection for the STA", but is intended to deal with specific issues through agreement between the agencies.

Environmental protection of the STA is provided by a combination of legal statutes, established and proposed mitigation measures, regulatory limitations, and assessment processes. The Mendocino Woodlands State Parks is surrounded by a 200-foot-wide special treatment area established in the Forest Practice Rules. In addition, the Woodlands STA provides for consultation between CAL FIRE and DPR when timber harvesting is considered within that area. Other limitations and protection measures are provided in the current MOU, while still other limitations are provided in the draft management plan and the EIR. The reader is referred to Sections VII and VIII of the DEIR for an analysis of potential impacts to forest and watershed resources, recreational uses, and aesthetics associated with forest management activities.

FINAL EIR FOR JDSF MANAGEMENT PLAN

Response to Comment 6

Note: The Railroad Gulch research area will be managed as a continuing demonstration of selection management, not for old growth development.

By using the term “old growth development,” the commenter appears to be describing the proposed form of stand management for most of Woodlands STA, that being late-seral development. The intent of this form of management is to produce stand conditions that support species normally associated with old-growth forests, and it is generally recognized that this form of habitat is dominated by larger, older trees, with a layered canopy and a high degree of diversity. This form of habitat also exhibits some degree of decadence, containing structural elements of value to wildlife, including snags, down logs, and cavities. It is also recognized that late-seral forests can be highly variable, so no single description or guideline is available to describe conditions or management prescriptions to achieve those conditions. Forests are dynamic by their very nature, and no forest condition is static through time. It is anticipated that a long period of time will elapse, and perhaps several incremental management steps undertaken, as the stands approach a late-seral condition. Please refer to Section VII.6.3 of the DEIR for a discussion of late-seral development.

Response to Comment 7

Potential impacts to persons and recreational users are considered and assessed in DEIR sections VII.3 (Air Quality), VII.12 (Noise), and VII.14 (Recreation). Depending upon the location, timing, and specific characteristics of a timber harvest proposal, a host of mitigation measures and other limitations are available to prevent significant effects related to noise and dust. Among these are choice of yarding methods, routes of travel, road surface treatment options, season of operations, timing of operations, and application of buffers. In addition, CAL FIRE would confer with DPR concerning the potential for impacts upon camp operations. As can be seen in ADFPMP Table 9, no timber operations are proposed in close proximity to camp sites in the short term (the next 5 to 7 years). Each timber harvest proposal is subject to a multi-disciplinary review and assessment of potential impacts when the specific proposal is planned. The RDEIR did not find that Alternative G, which is the basis for the ADFPMP, would result in any significant adverse impacts to the various resource values discussed here.

Response to Comment 8

The Woodlands STA is located within Jackson Demonstration State Forest. The legislated purpose of the State Forest is to serve as a demonstration of economical forest management [Public Resources Code § 4631(d)]. Recreation is recognized as an important, yet secondary use of the State Forest. The Federal deed restrictions associated with management of the area have been discussed above, as has the primary educational purpose for the Mendocino Woodlands State Park. Each of these mandates includes forest management or utilization. The recreational-educational trails within the STA and the Park offer the public an opportunity to observe nature and forests in both a natural and managed state. The recreational use of trails is discussed, considered, and assessed in Section VII.14 of the DEIR. As the DEIR and RDEIR demonstrate, proposed management provisions and mitigation measures will prevent significant impacts to aesthetics. In most instances, trails in close proximity to logging operations will be temporarily closed to provide for public safety until logs have been removed from the sites and operations have been completed. Management and mitigation measures may include a combination of visual buffers, harvesting restrictions, seasonal restrictions, and limitations upon silvicultural and yarding systems.

Response to Comment 9

The regularly maintained trails within the Woodlands STA have been identified within the ADFPMP, the DEIR, and the interagency MOU. The trails will not be reduced. When timber operations are conducted in close proximity to established trails, there may be a temporary reduction in availability for the sake of public safety. In most instances, alternative trails and routes are available. It is highly unlikely that a significant portion of the total trail system will be closed at any given time. Based upon the short-term harvest schedule for the State Forest (ADFPMP Table 9), very little trail is expected to be affected over the next 5 to 7 years.

FINAL EIR FOR JDSF MANAGEMENT PLAN

Response to Comment 10

The potential for incremental or cumulative impacts to watershed resources has been thoroughly considered. Please refer to section VIII.4 of the DEIR. In addition, the location of the state park provides additional buffer for the Little North Fork of Big River and some of its tributaries. Recreational activity also has potential to impact watershed resources. Please refer to section VII.14 of the DEIR for a discussion of potential recreational impacts. The DEIR and RDEIR concluded that Alternatives C1 and G, respectively, with the application of the various detailed management measures and mitigations, would not result in any significant adverse impacts with respect to watershed resources.

Response to Comment 11

Please refer to sections VII.6.1, VII.6.10, and VIII.4 of the DEIR for the assessment of potential impacts to watershed and aquatic resources. The DEIR and RDEIR concluded that Alternatives C1 and G, respectively, with the application of the various detailed management measures and mitigations, would not result in any significant adverse impacts with respect to watershed and aquatic resources.

Response to Comment 12

The EIR and management plan are intended to describe and consider management of the State Forest, and to consider, assess, and mitigate environmental impacts. The issue of designation of administrative agency for the STA is not within the authority of the Board of Forestry, the Department of Forestry and Fire Protection, nor the Department of Parks and Recreation, and is beyond the scope of the analysis performed for the EIR.

Response to Comment 13

Setting some forest stands aside to serve as controls for the sake of comparison has merit and is likely to be an element of the demonstration that is ultimately performed. However, setting aside the entire STA is not in keeping with the legislative mandate for the State Forest (PRC 4631.5(a)). There are thousands of acres of second and third-growth forest within local and regional state, local, and national parks that are also available to serve as examples of how redwood forests develop in the absence of active management.

Response to Comment 14

No timber harvesting is proposed within the south side STA (non-contiguous portion of JDSF) in the near term (the next 5 to 7 years). At all times, the public's use and enjoyment of the STA will be an important consideration during the planning and implementation of timber harvest activities. As each project is proposed, the potential environmental effects will be thoroughly assessed, including the consideration of public and agency input, including that of DPR and the Mendocino Woodlands Camp Association. The ADFMP already provides for management of the northern portion of the STA on a selective basis by designating most of it for late seral forest development and applying other management requirements.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P- 117
Virginia Sharkey : Box 20, Mendocino, California 95460 : Telephone (707) 937-3021

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FEB 15 2006

BOARD OF FORESTRY
AND FIRE PROTECTION

Feb 10, 2006

Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244

Re: Jackson State Forest

Dear Members of the Board,

I have lived in the Mendocino Coast since 1988 and Jackson State Forest I regard as one of our community's treasures — for all of us citizens. I am quite familiar with the dismal rates of remaining old growth redwood, both in this county and in the state.

1 [I am adamantly opposed to Alternative C and urge you to support Alternative F. Please emphasize the aspect of conservation, along with the very careful harvesting this alternative indicates. We need the best environmental protection for these resources, which would be Alternative F, but recognizing the need for balance, I feel that Alternative F would be the most appropriate.

Sincerely,
Virginia Sharkey

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-117

Response to Comment

Opposition to Alternative C and support of Alternative F is noted. Alternative G was developed by blending the elements and management strategies of several Alternatives, including Alternative F. This includes a reduction in the use of even-age management and clearcutting, a reduction in the planned timber harvest level, an increase in the area dedicated to development of late-seral forest conditions, an increase in resource protection and restoration measures, such as snag retention and LWD placement, and a management emphasis on research, demonstration and education. The Board supports a balanced, multiple use concept and sustained production of high quality timber products.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-119

February 13, 2006

State Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

Re: Jackson Forest Management Plan and EIR

Dear Board Members:

- 1 [I am writing to express my opposition to the proposed Management Plan and EIR for Jackson State Forest. The plan's clearcutting, large-scale commercial logging, cutting of the oldest second-growth stands, inadequate stream protection and use of pesticides are all unacceptable.
- 2 [Adoption of this plan would result in the clearcutting of 30% of Jackson State Forest. The level of logging would increase to 60,00 trees a year. Despite this, the EIR concludes that such horrendous destruction can be done with "less than significant environmental impact". The utter absurdity of such a conclusion is obvious.
- 3 [The new Management Plan and EIR attempt to justify the irresponsible and irreparable destruction of a living forest - for profit.

Sincerely,
Dawne Schulte
(Miss) Dawne Schulte
199 Florence Street
Ft. Bragg, CA 95437-4401

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BOARD OF FORESTRY
AND FIRE PROTECTION

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-119

Response to Comment 1

Please see response to Form Letter 2.

Response to Comment 2

There apparently is a misconception that the adoption of the DFMP and the DEIR will result in the immediate removal of 30% of the standing timber. Alternative G includes a reduction in the use of even-age management and clearcutting, a reduction in the planned timber harvest level, an increase in the area dedicated to development of late-seral forest conditions. Even-aged management will be implemented in increments over the next several decades, within the applicable limits provided in the management plan.

Please see General Response 10.

The harvest level is regulated by the total board foot volume rather than a specific number of trees. As stated above, the current management plan calls for a reduction in the total harvested volume. Harvest level stated in volume rather than individual number of trees is used for planning as this reflects the stand conditions more fully.

While the veracity of the quoted number of 60,000 trees harvested per year is not stipulated for the reasons stated above, the resultant harvest would equate to an average of 1.2 trees per acre per year. The statement provides no evidence that this level of harvesting would create “horrendous destruction”, or significant environmental impact. The DEIR and the ADFFMP represent a good faith effort to guide the integrated use and protection of the Forest’s resources, to meet the requirements of legislation and Board policy, and to address local, regional, and statewide issues.

Response to Comment 3

Comment noted. Support for Alternative F, with a second choice of Alternative E noted. Alternative G was developed by blending the elements and management strategies of several Alternatives, including Alternatives E and F. This includes a reduction in the use of even-age management and clearcutting, a reduction in the planned timber harvest level, an increase in the area dedicated to development of late-seral forest conditions, an increase in resource protection and restoration measures.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-120

Board of Forestry and Fire Protection
P.O. Box 944 246
Sacramento, CA 94244

Marie Champagne
P.O. Box 1
Caspar, CA. 95420

Dear Members of the Board,

This letter is written in regards to the Environmental Impact Report (EIR) for Jackson State Forest. I have grown up in Caspar, near Jackson State Forest. I am now sixteen, and ever since I was a small child I have enjoyed the beautiful trails of Jackson State. My father used to take me out in the woods and we would wonder from grove to grove amongst the redwoods pretending and playing games. Sometimes we brought picnics and sat on a mossy bank nibbling and chatting. I remember how sad it was when past logging destroyed our shady hangouts, leaving dusty clearings full of debris.

There is still many beautiful trees left, and since then I have enjoyed walking and riding my horses through the woods. The trails go on for miles and are perfect for riding horses hours on end. I am afraid of what extensive logging and clear cutting would do to this lovely area. Logging trucks roaring by makes it nerve-racking to ride horses. Their thundering noise can scare horses, and make riding along the dirt roads dangerous. I would hate to see miles of stumps instead of tall trees. I have also heard that herbicides may be used, and I find the idea of that happening so close to my home very disturbing. Such chemicals can be serious health hazards. If Jackson State Forest becomes no longer suitable for riding I will have no where to go with my horses. We can't afford a horse trailer, and there are no other good trail riding areas near by.

I know that many other local bikers, horse riders, and walkers share my concerns and hope to continue in the recreational use of Jackson State. I oppose option C, because it provides for clear cutting in the forestry plan. Please adopt alternative F, which provides a compromise between some necessary logging, and environmental and recreational purposes. My second choice would be option E.

Marie Champagne

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BOARD OF FORESTRY
AND FIRE PROTECTION

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-120

Response to Comment 1

The ADFFMP calls for a reduction in the use of the clearcutting method and the total timber harvest, when compared to the previous management plan (see General Response 2 and 10). CAL FIRE has been actively managing this forest for approximately 60 years under the Legislative mandate for the “purpose of demonstrating economical forest management”. Part of that management included restoring the forest from a largely cut over industrial property to the well stocked second growth forest that exists today. CAL FIRE has consistently harvested well below the level of annual growth, resulting in an ever increasing forest inventory on the Forest, with a substantial component of large young trees. Past management has resulted in a landscape that is conducive to multiple-use, including recreation, however demonstrating and improving sustainable forest management practices, including timber harvesting, will remain the primary purpose of Jackson State Forest. The Board supports a balanced, multiple use concept and sustained production of high quality timber products.

Response to Comment 2

Please see General Response 7.

Response to Comment 3

Please see General Response 14 for details on recreation on the State Forest. Opposition to Alternative C noted. Support of Alternative F noted. Support for Alternative E as a second choice noted. Alternative G was developed by blending the elements and management strategies of several Alternatives, including Alternatives E and F. This includes a reduction in the use of even-age management and clearcutting, a reduction in the planned timber harvest level, an increase in the area dedicated to development of late-seral forest conditions, an increase in resource protection and restoration measures.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-122

Anthony Miksak/Joselyn Bartlett

44002 Fern Creek Road, Box 49 • Caspar, CA 95420 • (707) 961-0230

February 9, 2006

Board of Forestry & Fire Protection
PO Box 944246
Sacramento, CA 94244

Dear Members of the Board,

We are writing to comment on the new Environmental Impact Report (EIR) for Jackson State Forest in Mendocino County. We are members of the Caspar Concerned Citizens who live next door to Jackson State Forest. We have witnessed the devastation resulting from the vast clear cut of this forest in the 1990's. We pledge that it should never happen again.

We strongly urge you to adopt Alternative F, the "Older Forest Emphasis" plan for management at Jackson. Given the legislative mandate under which the forest is operating, Alternative F provides for both environmental protection and timber production.

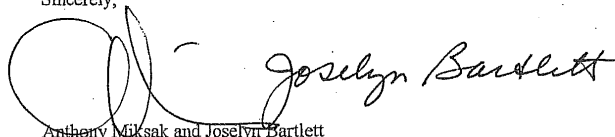
Our second choice would be Alternative E which would restore the forest to old growth over time, although this is not consistent with the legislative mandate for Jackson. This is the environmentally superior choice.

Public input is a necessary part of any decision about Jackson State Forest. A citizen's advisory committee is recommended because this is a public state park.

Any money made from Jackson State Forest should be returned to Jackson to protect the watershed, maintain roads and support the protection of this wonderful, rare resource.

Thank you,

Sincerely,


Anthony Miksak and Joselyn Bartlett

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BOARD OF FORESTRY
& FIRE PROTECTION

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-122

Response to Comment 1

Please see General Response 10.

Response to Comment 2

Support of Alternative F noted (see General Response 4). Alternative G was developed by blending the elements and management strategies of several Alternatives, including Alternative F. This includes a reduction in the use of even-age management and clearcutting, a reduction in the planned timber harvest level, an increase in the area dedicated to development of late-seral forest conditions. The Board supports a balanced, multiple use concept that provides high levels of resource protection and sustained production of high quality timber products. The ADFMP has placed greater emphasis on protection and restoration, with the goal of improving all resource values over time in comparison to existing conditions.

Response to Comment 3

Support for Alternative E as a second choice noted.

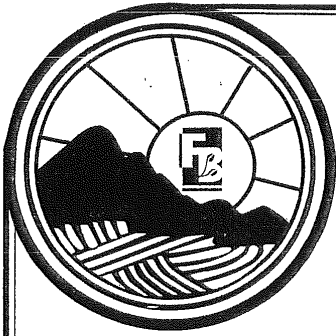
Response to Comment 4

Jackson Demonstration State Forest is not a “state park”. Past management has resulted in a landscape that is conducive to multiple-use, including recreation. Please see General Response 2. The Board has included plans for JDSF to enhance relationships with recreation user groups, including equestrians. With regard to an advisory body, please see General Response 18.

Response to Comment 5

The Board does not control the operating budget for the Forest. However, the Board supports the concept that the Forest be self sufficient, and that it develop sufficient funding to enable full implementation of the management plan.

FINAL EIR FOR JDSF MANAGEMENT PLAN



P-124

SAN MATEO COUNTY FARM BUREAU

765 MAIN STREET
HALF MOON BAY, CALIFORNIA 94019
PHONE (650) 726-4485

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BOARD OF FORESTRY
AND FIRE PROTECTION

February 11, 2006

George D. Gentry
Executive officer
Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

RE: Jackson Demonstration State Forest Draft EIR and Management Plan

Dear Mr. Gentry,

The San Mateo County Farm Bureau has reviewed the Draft EIR and Management for the Jackson Demonstration State Forest (JDSF). Based on the information contained in the Management plan, we strongly recommend you adopt alternative B, and continue with the historic style of professional management to continue with the benefits this forest can provide to ensure sustainability in our timber industry here in California.

Due to the lawsuit this forest has suffered from a lack of good stewardship, and as a result there has been no stream restoration, limited road maintenance, no timber stand improvement, no research and little or no recreational use of the JDSF. Almost all infrastructure is in disrepair and local and state government has lost millions of dollars in revenue.

The research done at JDSF is world renowned, and this forest has been providing information on sustainable forestry for fifty years. JDSF is home for a permanent plot system that began in 1958 and generates the majority of the data for growth simulations used by timber managers throughout the north coast region. The watershed projects on Casper Creek are studied at every forestry school in the United States. In order for these kinds of research and study to occur, JDSF must remain in production to insure the diversity needed for the betterment of the timber industry. JDSF must continue to be a laboratory for research and demonstration of innovative techniques for private and public timberland owners.

The question that needs to be answered is the EIR Adequate? The courts have not looked for perfection in this document. They look for adequacy, completeness and a good faith effort at full disclosure. This EIR provides all the reasonable information

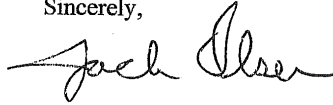
FINAL EIR FOR JDSF MANAGEMENT PLAN

needed to make a decision. As this is a programmatic EIR and is tied to a Timber Harvest Plan which is the functional equivalent of the CEQA process. Specific issues such as buffer zones, silvicultural prescriptions, streamside protection, and project level concerns will be addressed at that time. Within the Timber Harvest Plan the public will have many opportunities to address their concerns.

San Mateo County Farm Bureau feels alternative B is option that provides the best flexibility needed to insure the continued management of JDSF, and we feel it is imperative that the Board of Forestry do all in their power to reestablish and continue the vital work done at the JDSF.

Please share our letter with all members of the Board.

Sincerely,



Jack Olsen
Executive Administrator

Cc Mendocino County Farm Bureau
 Doug Mosebar, President CFBF
 California Forestry Association

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-124

Response to Comment

Please see response to Mailed Letter **P-7**. Support for Alternative B is noted. Alternative G was developed by blending the elements and management strategies of several Alternatives, including B. The plan will emphasize the research and demonstration mission of the state forest. The Board supports a balanced, multiple use concept that provides high levels of resource protection and sustained production of high quality timber products.

Please see also response to Form Letter 8.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-125

Board of Forestry and Fire Protection
P.O. Box 944 246
Sacramento, CA 94244

Rhonda Champagne
P.O. Box 1
Caspar, CA. 95420

Dear Members of the Board,

I am writing to comment on the new Environmental Impact Report (EIR) for Jackson State Forest. I am a Caspar Concerned Citizen and live right next door to Jackson State Forest. I have lived in East Caspar for sixteen years. The health and beauty of the forest, watersheds and streams in Jackson State are very important to me. My family walks, runs, bikes, and rides horses in Jackson State Forest. During our adventures over the years, we have met many other bikers, horse riders and dog walkers also out enjoying the forest and trails. I know this area is and has been enjoyed by many people. I would like greater emphasis placed on **restoration, recreation and research** in the management plan for Jackson State.

I have seen clear cuts first hand, and they are not an acceptable way to manage a forest. I **adamantly oppose option C**, which supports clear cutting. I earnestly urge you to **adopt option F**, the older forest emphasis plan for management. It provides a compromise between environmental protection and timber production. Option E would be my second choice.

Rhonda Champagne

Rhonda Champagne

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BOARD OF FORESTRY
AND FIRE PROTECTION

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-125

Response to Comment 1

Utilization of the forest for recreation noted. Desire for greater emphasis on restoration, recreation and research noted. The ADFMP strives to meet those goals (see General Response 2).

Response to Comment 2

Opposition to clearcutting noted (see General Response 10). The ADFMP limits the use of even-age management to approximately 26 percent of the Forest (see General Response 2). Most of the remaining area consist primarily of uneven-aged methods. Clearcutting is further restricted as described in General Response 10.

Response to Comment 3

Opposition to Alternative C noted. Support of Alternative F noted. Support for Alternative E as a second choice noted. Alternative G was developed by blending the elements and management strategies of several Alternatives, including Alternatives E and F. This includes a reduction in the use of even-age management and clearcutting, a reduction in the planned timber harvest level, an increase in the area dedicated to development of late-seral forest conditions, an increase in resource protection and restoration measures. The Board has included plans for JDSF to enhance relationships with recreation user groups.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-142

John G Dickerson
PO Box 301
Redwood Valley, CA 05470
(707) 485 0702 (johnd@pacific.net)

February 12, 2006

George D. Gentry
Executive Officer
Board of Forestry and Fire Protection
PO Box 944246
Sacramento, CA 94244-2460

**Comments Regarding Draft EIR
Jackson Demonstration State Forest**

I am the Executive Director of the Employers Council of Mendocino County (ECMC). ECMC is a nonprofit industry association with about 200 members who together provide 10% of the jobs in our County. However, these are my personal comments and are not from the Employers Council. I can not speak with authority on forestry or ecological issues. However, my education and professional experience is in economic history and strategic planning. In addition, for a decade I have been one of the most active individuals in analyzing the Mendocino County economy. These are my strengths that led ECMC to seek my services.

My comments regarding the Draft EIR and Management Plans for Jackson Demonstration State Forest (JDSF) are focused on long-range strategic issues and our state and local economy. There are three topics:

- The Mission of JDSF: Sustainable Forestry in a 14 Billion Person World
- Horrid imbalance in California's Consumption v. Production of Lumber
- Mendocino County's Economy

The Mission of JDSF: Sustainable Forestry in a 14 Billion Person World

California State leaders in 1946 saw the need to learn and demonstrate how to restore heavily cut-over forests to provide future lumber. As stated in the enabling legislation:

(The management of JDSF) shall be in conformance with forest management practices designed to achieve maximum sustained production of high quality forest products while giving consideration to values relating to recreation, watershed, wildlife, range and forage, fisheries and aesthetic enjoyment.

We owe a great deal to their foresight and vision. But today we're in a different world. In 1946 the world had 2.3 billion people. The nation had just emerged from World War II and feared the Great Depression wasn't over. The atomic bomb and the Iron Curtain had just been dropped, and the Cold War was just beginning. It's easy to see why the "American Dream" of owning a home, getting an education, having a good job, and being secure in a threatening world was the goal of many in that generation.

2 But people's views evolve over time. Since 1946 we've learned a lot about the impact of the 20th century's explosion in world population and our ability to impact nature through increasingly powerful technologies. Today we share the world with 6.5 billion people – about twice as many as were alive when JDSF was founded. We are clearly in the middle of the most profound change in humanity's ability to affect nature, for good, or for ill. And it's apparent the US will not be the singular wealthy and powerful nation in the world as we were coming out of WWII. It's entirely appropriate and in fact unavoidable to once again think about what JDSF's goals should be.

3 The UN expects 9.5 to 14 billion people to be alive in 95 years. As you know, ninety five years is not much in the life of forests. Billions of people are rapidly moving from third to first world consumer patterns in an increasingly global economy. According to Jared Diamond in his recent excellent book Collapse it took 8000 years to cut down the first 25% of the world's forests. The second 25% went in the last 50 years. Cut and run timber operations in third world countries threaten to remove almost if not all the world's lowland tropical forests in the next 50 years. Science has irrefutably shown that all of us are in big trouble without the world's forests.

4 How does that argue JDSF should be primarily a park? A park won't show us how to provide lumber to meet future demand while maintaining the health of forest ecosystems and the planet.

5 In Diamond's worst-case scenario all the world's forests outside heavily protected parks will be destroyed in this century. His best case is we learn how to provide the world's timber needs on 20% of its forests. This is precisely what JDSF should be about. It is 1946's mission updated for our time.

I can't urge you strongly enough to keep JDSF's mission and practices based solidly on the foundation established by its founders in 1946 updated to our times – learning and demonstrating how to move beyond past forestry practices that are increasingly unviable, and how to supply a much higher demand for wood products by a much larger population in the relatively near future while maintaining the health of forest and worldwide ecosystems at the same time.

Horrid imbalance in California's Consumption v. Production of Lumber

6 According to a series of articles a few years ago in the Sacramento Bee titled "A State of Denial", California was self-sufficient in lumber 50 years ago. Today we import 80% of the 8 billion board feet we use. We use more Canadian lumber than our own, where 90% is clear-cut and 2/3 from old growth. Lumber not produced in Jackson forces clear cuts in old growth Canadian forest. That not only doesn't make sense, but on its face is evidence of our statewide society's environmental irresponsibility. Instead of "Not In My Backyard" (NIMBY), we absolutely should produce more of our timber in our back yard.

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mendocino County's Economy

Thirty years ago 36% of the jobs in Mendocino County were in the wood products industry. Today it's less than 5%. No part of our county has been more harmed over the past 30 years than timber worker families. How can we in good conscience deny them jobs?

7 The County of Mendocino had less than \$20 million in debt 8 years ago; today it's \$132 million. I believe it will be at least \$150 million at the end of this year. We are now one of the most, and perhaps the most indebted County government per resident in the state. The collapse of the timber industry has greatly damaged the tax base of local jurisdictions. The resumption of timber harvest taxes is vital to their ability to recover.

8 We need to rebuild our economic base. We have only a few economic advantages in the global economy; growing redwoods clearly is one. If done correctly, timber production should be a long-term component of our local economy.

Thank you for the opportunity to submit these comments.



John G Dickerson

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-142

Response to Comments 1-2

Comments noted.

Response to Comments 3

The Board has given substantial consideration as to what goals should guide the management on Jackson Demonstration State Forest. The Administrative Draft Final Forest Management Plan being considered by the Board, which is based on Alternative G, provides an explicit set of goals for the management of the Forest (see Chapter 1).

Response to Comments 4

Comment noted.

Response to Comments 5

Since its establishment in the 1940s, JDSF has been managed by the State primarily for research and demonstration on sustainable forest management. The proposed Administrative Draft Final Forest Management Plan continues that direction, while incorporating new learning about sustainable forest management and providing an adaptive management component (see Chapter 5) to help continue that learning over time.

Response to Comments 6

Comment noted. A key part of the research and demonstration mission at JDSF is to help other forestland owners to learn how to manage their forests to increase their productivity of both timber and nontimber resources.

Response to Comments 7

The 2005 DEIR (see sections III.5, III.6, and VII.6.3) and the 2007 RDEIR (see section III.6.4) both provide substantial information and analysis related to the economy of Mendocino County.

Response to Comments 8

The Administrative Draft Final Forest Management Plan seeks to maintain timber as an important part of the county's economic base, both through timber production on JDSF and through increased productivity from other landowners who learn better management approaches through JDSF research and demonstration programs. Please see also above response to Comment 6.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-144

GRAVES APARTMENTS

44550 Little Lake Road, Mendocino CA 95460
mail: P.O. Box 1701, Fort Bragg CA 95460

January 30, 2006

George D. Gentry, Executive Officer
Board of Forestry & Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

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BOARD OF FORESTRY
AND FIRE PROTECTION

Mr. Gentry:

The reason for my letter is to insist that you to return Jackson Demonstration State Forest to active status. The shut down of Jackson Demonstration State Forest has had a devastating effect to our community and our county. In addition the State of California has not been receiving the much needed revenue from the sale of the timber.

JDSF was created in the 1950's as a demonstration forest; it has historically been a well managed forest. The proposed harvest rate for the forest will be less than 50% of it's annual growth. There are also road maintenance issues that will be addressed with the EIR.

I **urge** you to accept the proposed Alternative B EIR and return Jackson Demonstration State Forest to an active production forest. The revenue and jobs it will provide are very important to our community, county and our state.

Thank you for your consideration.

Sincerely,

Stacey Bradley

Stacey Bradley
Owner

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-144

Response to Comment

Please see response to Form Letters 1 and 4. See also General Response 2 and 13.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-147

*Theodore W. Wooster
Consulting Biologist and Designated Biologist-Retired
6645 Yount Street, Yountville, CA 94599
Telephone and Fax Number (707) 944-8451*

February 21, 2006

Board of Forestry
P. O. Box 944246
Sacramento, California 94244-2460

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BOARD OF FORESTRY
AND FIRE PROTECTION

Dear Persons:

I am writing to provide additional information and recommendations on the draft Environmental Impact Statement for the Jackson Demonstration State Forest.

1 I have been involved with the Forest since 1976 when I became the Environmental Services Supervisor for the Region III, California Department of Fish and Game. From 1976 through 1999 when I retired I was involved in the review of all timber harvest plans on the Forest. In addition, I was designated by the State in 1990 to determine what measures were to be implemented to avoid take of the Northern spotted owl. In 1989 through 1992, I personally surveyed for active Northern spotted owls activity centers on the Forest.

As a result of those surveys and those that followed through the 1997 season, a draft report, dated December 8, 1998 was prepared. It is titled "Distribution and Status of the Northern spotted owl in Jackson Demonstration State Forest, CA 1990-1997 (Attachment 1). This report basically concluded that there are approximately 14 activity centers of Northern spotted owls on the forest of which most have successfully nested in the managed second growth redwood and coastal Douglas-fir forests in Jackson Demonstration State Forest. Studies since 1997 have also verified the continuation of these activity centers.

Also attached is a report by Gregory A. Guisti entitled "Woodrats and Northern Spotted Owls" published in the March 1999 issue of the Journal of Forestry (Attachment 2).

From these two studies it can be concluded that:

1. Woodrats are the most important food source for spotted owls in the redwood region.
2. Management activities that create dispersed clear cuts or group selection cuts (1 to 20 acres in size) could be useful in providing habitat for the primary NSO prey (woodrats).
3. The crude density of Northern spotted owls is much less on Jackson Demonstration State Forest than on Georgia Pacific lands (now Campbell) and/or Louisiana Pacific lands (now Mendocino Redwood Company).

I believe the lower density of Northern spotted owls' on the Forest are the result of much of the Forest has not been managed since it grew back from the original cuttings. There is a paucity of wildlife associated with these almost pure dense stands of Douglas fir and redwood of uniform


FINAL EIR FOR JDSF MANAGEMENT PLAN

size and height.

- 2 [From my review of past Timber Harvest Plans on the Forest and subsequent results of wildlife diversity, I believe that "Alternative C 1 the proposed Project-Management Consistent with the May 2002 Draft Management Plan": is the best alternative to maintain and improve the long term wildlife values on the Forest and in particular the Northern spotted owl.

Thank you for the opportunity to comment.

Sincerely,


Theodore W. Wooster
Consulting Biologist

FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-147

Response to Comment 1

The Board is aware of the surveys and the resulting report, "The Distribution and Status of the Northern Spotted Owl in Jackson Demonstration State Forest". This information is utilized by JDSF staff.

Future forest management will be designed to provide a variety of habitats and stand conditions. The desired future condition of the Forest will include a variety of tree sizes, densities, and spatial arrangements of trees and stands. Harvest operations will be restricted to the use of single tree and small cluster selection on portions of the Forest, but significant areas dispersed across the Forest will be designated to allow group selection and even-aged management (see General Response 2 and 10). The protection, retention and recruitment of structural elements including snags, LWD, and trees with deformities, such as broken tops, will be incorporated into silvicultural prescriptions to further enhance wildlife values.

Response to Comment 2

Support of Alternative C1 noted. Alternative G was developed by blending the elements and management strategies of several Alternatives, including Alternative C1. The Board has emphasized JDSF research and demonstration role.

FINAL EIR FOR JDSF MANAGEMENT PLAN

P-149

Henry E. Gundling
P.O. Box 589
Philo, CA 95466

George D. Gentry
Board of Forestry & Fire Protection
P.O. Box 94246
Sacramento, CA 94224-2460

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BOARD OF FORESTRY
AND FIRE PROTECTION

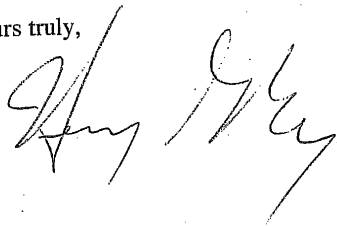
Feb. 15, 2006

Gentlemen,

1 I am writing in support of Alternative D with regard to the Jackson Demonstration State Forest – EIR Draft. I have been involved in forestry issues in Mendocino County since 1988 and served on the county Forest Advisory Committee, the JDSF-CAC and have been on the Mendocino County Forest Council since its inception. I also own redwood forest land in the county which has been conservatively managed since 1968 with the same spectacular results as JDSF. ..

2 Director Wilson set up the CAC to help quell the anger and unhappiness of local residents who were primarily concerned about old growth retention, even-age management and herbicides. That tension still exists today and could even increase due to the influx of new people living in the Ft. Bragg area. If you want to end this bitter struggle, the CAC recommendations would be a great way to begin. In most respects CDF has done a fine job of managing JDSF over the years, particularly when compared to the neighboring industrial properties. The shut down of operations the last few years has been an economic tragedy for CDF and Mendocino County and so it is imperative to get the forest up and running again. The only good thing that can be said about the whole fiasco is that the trees continue to grow. With a little give on the part of CDF on even-age management and herbicides, there should be a light at the end of this tunnel. In addition, the net result to all of us will be a more valuable resource in the future.

3 Yours truly,



FINAL EIR FOR JDSF MANAGEMENT PLAN

Mailed Letter P-149

Response to Comment 1

Support for Alternative D noted. Alternative G was developed by blending the elements and management strategies of several Alternatives, including Alternative D. This includes accelerated implementation of the Road Management Plan, a reduction in the use of even-age management and clearcutting, a reduction in the planned timber harvest level, an increase in the area dedicated to development of late-seral forest conditions, an increase in resource protection and restoration measures, such as snag retention and LWD placement, and a management emphasis on research, demonstration and education.

Response to Comment 2

The Board recognizes that old growth, herbicides, and even-age management are contentious issues. The ADFFMP protects old growth from harvesting (see General Response 8), and restricts the use of herbicides (see General Response 7), and even-age management (see General Response 10). The ADFFMP contains provisions regarding a new JDSF advisory committee that will provide for local representation and provide a forum for local input on the management of JDSF.

Response to Comment 3

The Board concurs that the Forest has been well managed in most respects. Unfortunately, there is no alternative likely to bring an end to controversy concerning the management of JDSF. The ADFFMP strives to balance concerns while remaining consistent with the legislative mandate and Board policy for the state forest system.

The Board recognizes the negative economic impacts that the “shut down of operations” has had on CAL FIRE and Mendocino County. The Board agrees that it would be highly beneficial for the State Forest to resume management activities, so the Board is working actively to complete the EIR process and approve a management plan.